

**MONTANA DEPARTMENT OF ENVIRONMENTAL QUALITY**  
**Permitting and Compliance Division**  
**Waste & Underground Tank Management Bureau**

**FIELD INVESTIGATION REPORT**

**SITE:** Asarco - East Helena Facility

**EPA ID:** MTD006230346

**LOCATION:** East Helena

**DATES & TIMES:** July 31, 2008 @ 8:30 am

**INSPECTION LENGTH:** 2 Hours

**CONTACT:** Jon Nickel, Asarco Representative

**INSPECTION TEAM:** Iver L. Johnson

**PURPOSE:** Compliance Evaluation Inspection

**REPORT PREPARED BY:** Iver L. Johnson

**BACKGROUND:** The purpose of this inspection was to inspect and document, via digital photographs, Asarco's efforts to clean the Ringling, Barnum and Bailey Coverall Buildings, the Concentrate Storage and Handling Building (CSHB) and the Direct Smelt Building.

The waste material previously stored in these five containment buildings has been placed in the CAMU Phase 2 cell.

I previously arranged with Mr. Nickel to conduct this inspection on this date and time.

**RESULTS OF THE INSPECTION:** Upon arrival at the East Helena facility, I met Mr. Nickel in his office. We reviewed the past Quarterly Progress Report and discussed the 2008 modified Cleaning and Demolition Plan. After looking over the 2008 schedule I suggested to Mr. Nickel that Asarco may want to change the sequence of the facilities to be cleaned and demolished based upon equipment availability and possible late fall storm events.

We proceeded to walk to the five waste material containment buildings.

I took digital photographs to document the current status of the buildings for inspection purposes.

Ringling Coverall Building: Asarco is scheduled to dismantle the Ringling Coverall Building this year. In order to do this URS moved 748 tons of waste material from the Ringling Coverall Building to the CAMU. The floor and concrete lego blocks, making up the inside of the waste containment system, had been cleaned, swept, vacuumed and power-washed. I noted that the south portion of the lego block wall was being dismantled and the floor re-swept and cleaned of all debris at the time of the inspection. (See photos 001 and 002 in the attached photolog).

Barnum Coverall Building: Asarco is scheduled to dismantle the Barnum Coverall Building for shipment to their Hayden Arizona smelter. URS moved 4,518 tons of waste material from the Barnum Coverall Building to the CAMU. The floor and concrete lego blocks, making up the inside of the waste containment system, had been cleaned, swept, vacuumed and power-washed. (See photos 003 through 006 in the attached photolog).

Bailey Coverall Building: Asarco is scheduled to dismantle the Bailey Coverall Building for shipment to their Hayden Arizona smelter. URS moved 3,563 tons of waste material from the Bailey Coverall Building to the CAMU. The floor and concrete lego blocks, making up the inside of the waste containment system, had been cleaned, swept, vacuumed and power-washed.

I noted that some waste had fallen onto the floor from the cracks in the lego block wall in the Bailey Coverall Building since the floor was cleaned. The waste appeared to contain copper as the staining on the floor was blue and green in color. (See photos 007 through 010 in the attached photolog).

Concentrate Storage and Handling Building (CSHB): This containment building is not scheduled for demolition at this time. URS moved 12,337 tons of waste material from the CSHB to the CAMU. The CSHB floor has been swept with a street sweeper, but, not vacuumed or power-washed in anticipation of storing additional waste material in the near future. (See photographs 011 through 014 in the attached photolog).

Direct Smelt Building (DSB): This containment building is not scheduled for demolition at this time. URS moved 1,785 cubic feet of Asbestos Containing Material (ACM) from the DSB to the CAMU. The DSB floor has not been swept, vacuumed or power-washed.

At the conclusion of the inspection, I took a digital photo of the interior of the Sodium Metal Building and noted that the rail tank car and heating coils have been removed and sent off for metal recycling. The building is now used to house Asarco facility and personal vehicles. (See photo 015 in the attached photolog).

Note: A copy of the digital photographs taken during this inspection is filed in the Department's Asarco facility folder along with this report.

**ADDENDUM:** On August 20, 2008, Mr. Nickel told me in a telephone conversation that all the lego blocks have been removed from the Ringling Coverall Building. The lego block waste on the floor in the Bailey Coverall Building has been collected and the floor cleaned once again.

In addition, it appears that the Barnum and Bailey Coverall Buildings failed to meet closure and post-closure care requirements as per 40 CFR 265.1102 until the lego block walls are removed from these two buildings due to waste material that remains embedded in the cracks of the lego walls.

**WASTE MINIMIZATION REVIEW:** None discussed.

**RECOMMENDATIONS:** Continue to adhere to Montana's Hazardous Waste Management regulations.

August 21, 08

Date of Inspection Report

Iver L. Johnson

Iver L. Johnson  
Hazardous Waste Specialist

PHOTO #: ASARCO\_08213-001  
SUBJECT: Compliance Inspection  
LOCATION: East Helena, MT.  
COUNTY: Lewis & Clark  
DATE OF INSPECTION: July 31, 2008  
WEATHER: Sunny  
PHOTOGRAPHER: Iver L. Johnson  
PHOTOGRAPHER (sig.) Iver L. Johnson  
WITNESS:  
CAMERA: Fujifilm Finepix F40 Digital Camera  
FILM TYPE: N/A  
NEGATIVE LOCATION: N/A  
EXPLANATION:

Looking south at the Ringling Building and vehicle access door.

COPY



MT DEQ WUTM BUREAU

PHOTO #: ASARCO\_08213-002  
DATE: July 31, 2008  
PHOTOGRAPHER: Iver L. Johnson  
PHOTOGRAPHER (int.) Iver L. Johnson  
CAMERA: Fujifilm Finepix F40 Digital Camera  
FILM TYPE: N/A  
NEGATIVE LOCATION: N/A  
EXPLANATION:

Inside the Ringling Building, the floor and concrete lego blocks, making up the inside of the waste containment system, had been cleaned, swept, vacuumed and power-washed.

The lego block walls were being removed from the building at the time of the inspection and the floor was being swept and cleaned again.



MT DEQ WUTM BUREAU

PHOTO #: ASARCO\_08213-003  
DATE: July 31, 2008  
PHOTOGRAPHER: Iver L. Johnson  
PHOTOGRAPHER (int.) Iver L. Johnson  
CAMERA: Fujifilm Finepix F40 Digital Camera  
FILM TYPE: N/A  
NEGATIVE LOCATION: N/A  
EXPLANATION:

Looking west at the east access door to the Barnum Building.





**MT DEQ WUTM BUREAU**

PHOTO #: ASARCO\_08213-004  
DATE: July 31, 2008

PHOTOGRAPHER: Iver L. Johnson  
PHOTOGRAPHER (int.) I.L. Johnson  
CAMERA: Fujifilm Finepix F40 Digital Camera  
FILM TYPE: N/A  
NEGATIVE LOCATION: N/A  
EXPLANATION:

Looking west at the Barnum Building.



**MT DEQ WUTM BUREAU**

PHOTO #: ASARCO\_08213-005

PHOTOGRAPHER: Iver L. Johnson  
PHOTOGRAPHER (int.) I.L. Johnson  
CAMERA: Fujifilm Finepix F40 Digital Camera  
FILM TYPE: N/A  
NEGATIVE LOCATION: N/A  
EXPLANATION:

Inside the Barnum Building, the floor and concrete lego block walls, making up the inside of the waste containment system, had been cleaned, swept, vacuumed and power-washed.



**MT DEQ WUTM BUREAU**

PHOTO #: ASARCO\_08213-006

PHOTOGRAPHER: Iver L. Johnson  
PHOTOGRAPHER (int.) I.L. Johnson  
CAMERA: Fujifilm Finepix F40 Digital Camera  
FILM TYPE: N/A  
NEGATIVE LOCATION: N/A  
EXPLANATION:

Another view of the north side lego block wall inside the Barnum Building. The height of the wall is approximately 10-feet.



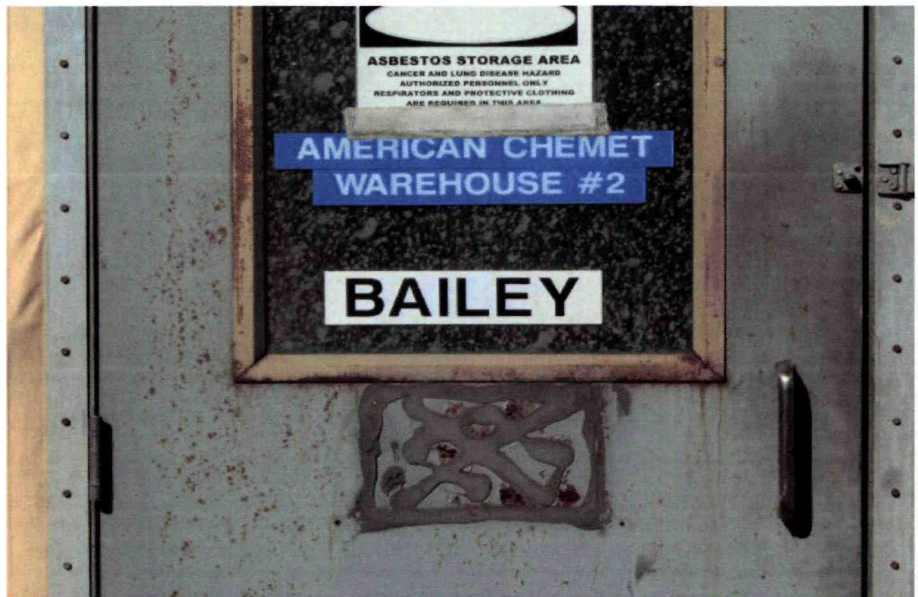


**MT DEQ WUTM BUREAU**

PHOTO #: ASARCO\_08213-007  
DATE: July 31, 2008

PHOTOGRAPHER: Iver L. Johnson  
PHOTOGRAPHER (int.) I. Johnson  
CAMERA: Fujifilm Finepix F40 Digital Camera  
FILM TYPE: N/A  
NEGATIVE LOCATION: N/A  
EXPLANATION:

Looking south at the north man-door leading into the Bailey Building.



**MT DEQ WUTM BUREAU**

PHOTO #: ASARCO\_08213-008  
DATE: July 31, 2008

PHOTOGRAPHER: Iver L. Johnson  
PHOTOGRAPHER (int.) I. Johnson  
CAMERA: Fujifilm Finepix F40 Digital Camera  
FILM TYPE: N/A  
NEGATIVE LOCATION: N/A  
EXPLANATION:

Looking south at the Bailey Building.



**MT DEQ WUTM BUREAU**

PHOTO #: ASARCO\_08213-009  
PHOTOGRAPHER: Iver L. Johnson  
PHOTOGRAPHER (int.) I. Johnson  
CAMERA: Fujifilm Finepix F40 Digital Camera  
FILM TYPE: N/A  
NEGATIVE LOCATION: N/A  
EXPLANATION:

Inside the Bailey Building, the floor and concrete lego block wall, making up the inside of the waste containment system, had been cleaned, swept, vacuumed and power-washed.





**MT DEQ WUTM BUREAU**

PHOTO #: ASARCO\_08213-010

DATE: July 31, 2008

PHOTOGRAPHER: Iver L. Johnson

PHOTOGRAPHER (int.)

CAMERA: Fujifilm Finepix F40 Digital Camera

FILM TYPE: N/A

NEGATIVE LOCATION: N/A

EXPLANATION:

This photo shows some remaining waste that had fallen out onto the floor from the cracks in the lego block wall since the floor was cleaned. The waste appeared to contain copper as the staining on the floor was blue and green in color.



**MT DEQ WUTM BUREAU**

PHOTO #: ASARCO\_08213-011

DATE: July 31, 2008

PHOTOGRAPHER: Iver L. Johnson

PHOTOGRAPHER (int.)

CAMERA: Fujifilm Finepix F40 Digital Camera

FILM TYPE: N/A

NEGATIVE LOCATION: N/A

EXPLANATION:

This photo was taken inside the Concentrate Storage Handling Building (CSHB). Looking west, all the waste previously stored on this level had been removed and disposed in the CAMU.

Note: The CSHB floor has been swept with a street sweeper, but, not vacuumed or power-washed in anticipation of storing additional waste in the near future.



**MT DEQ WUTM BUREAU**

PHOTO #: ASARCO\_08213-012

PHOTOGRAPHER: Iver L. Johnson

PHOTOGRAPHER (int.)

CAMERA: Fujifilm Finepix F40 Digital Camera

FILM TYPE: N/A

NEGATIVE LOCATION: N/A

EXPLANATION:

This photo was also taken inside the Concentrate Storage Handling Building (CSHB). Looking into the I-Bin, all the waste previously stored in this bin had been removed and disposed of in the CAMU except for a small amount of waste collected by the street sweeper.

Note: The I-Bin had been swept, but, not vacuumed or power-washed in anticipation of storing additional waste in the near future.





**MT DEQ WUTM BUREAU**

PHOTO #: ASARCO\_08213-013

PHOTOGRAPHER: Iver L. Johnson

PHOTOGRAPHER (int.) Iver L. Johnson

CAMERA: Fujifilm Finepix F40 Digital Camera

FILM TYPE: N/A

NEGATIVE LOCATION: N/A

EXPLANATION:

This photo was taken inside the Direct Smelt Building. Asbestos waste previously stored in this building had been removed and disposed of in the CAMU.

Note: The Direct Smelt Building floor has not been swept, vacuumed or power-washed.



**MT DEQ WUTM BUREAU**

PHOTO #: ASARCO\_08213-014

PHOTOGRAPHER: Iver L. Johnson

PHOTOGRAPHER (int.) Iver L. Johnson

CAMERA: Fujifilm Finepix F40 Digital Camera

FILM TYPE: N/A

NEGATIVE LOCATION: N/A

EXPLANATION:

Another view inside the Direct Smelt Building where cardboard containers of asbestos waste was previously stored.



**MT DEQ WUTM BUREAU**

PHOTO #: ASARCO\_08213-015

DATE: July 31, 2008

PHOTOGRAPHER: Iver L. Johnson

PHOTOGRAPHER (int.) Iver L. Johnson

CAMERA: Fujifilm Finepix F40 Digital Camera

FILM TYPE: N/A

NEGATIVE LOCATION: N/A

EXPLANATION:

This photo shows the inside of the Sodium Metal Building after the rail tank car and heating coils were removed, cut-up and sent off for metal recycling.

The building is now used to house Asarco facility and personal vehicles.

